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**American
Chemistry
Council** Good Chemistry
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October 13, 2005

US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

Re: Petroleum Additives Panel Health Environmental and Regulatory Task Group HPV Challenge
Final Submission for the Alkaryl Sulfonate Category

To Whom It May Concern:

On October 8, 2001, the American Chemistry Council, Petroleum Additives Panel, Health, Environmental and Regulatory Task Group (HERTG) submitted a test plan and supporting robust summaries for the following twelve chemicals in the alkaryl sulfonate category:

- Sulfonic acids, petroleum, calcium salts - (CAS # 61789-86-4, referred to in this report as petroleum derived calcium salt)
- Sulfonic acids, petroleum, barium salts - (CAS # 61790-48-5, referred to in this report as petroleum derived barium salt)
- Sulfonic acids, petroleum, sodium salts - (CAS # 68608-26-4, referred to in this report as petroleum derived sodium salt)
- Sulfonic acids, petroleum, calcium salts, overbased - (CAS # 68783-96-0, referred to in this report as petroleum derived calcium salt, overbased)
- Benzenesulfonic acid, mono-C16-C24 alkyl derivatives, calcium salts - (CAS # 70024-69-0, referred to in this report as C16-C24 alkaryl calcium salt derivative)
- Benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 71486-79-8, referred to in this report as mixed mono-C15-C30 and di-C11-C13 alkaryl calcium salt, overbased derivative)
- Benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives - (CAS # 71549-79-6, referred to in this report as mixed mono-C15-C30 and di-C11-C13 alkaryl derivative)
- Benzenesulfonic acid, mono and dialkyl derivatives, magnesium salts - (CAS # 71786-47-5, referred to in this report as alkaryl magnesium salt derivative)
- Benzenesulfonic acid, C15-C30 alkyl derivatives, sodium salts - (CAS # 78330-12-8, referred to in this report as C15-C30 alkaryl sodium salt derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts - (CAS # 115733-09-0, referred to in this report as C14-C24 alkaryl calcium salt derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 115733-10-3, referred to in this report as C14-C24 alkaryl calcium salt, overbased derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives - (CAS # 115829-36-2, referred to in this report as C14-C24 alkaryl derivative)



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The HERTG has completed the proposed testing described in the test plan for the alkaryl sulfonate category. Attached to this letter are the HERTG's final HPV submission of the category analysis document and corresponding robust summaries which are submitted to fulfill the HERTG's HPV commitment for the alkaryl sulfonate category.

If you have any questions or comments, please contact me at (703) 741-5607 or via email at Sarah_McLallen@americanchemistry.com.

Sincerely yours,

Sarah Loftus McLallen
Manager, HERTG

Attachments: Final Submission for Alkaryl Sulfonate Category & Robust Summary Document